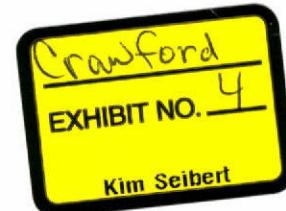


DECLARATION

1. My name is John W. Crawford. I am over 21 years of age and competent to make this Declaration. I have never been convicted of a felony.
2. I am employed by the Texas Department of Public Safety (DPS), where I serve as Applications Manager, Licensing Services, Information Technology Division. In that capacity, I aided in the extraction of data from the Texas Driver License System (DLS) database that was produced by DPS in this litigation. I am authorized to sign this Declaration.
3. On July 22, 2014, DPS learned that the extraction of the DLS database completed on January 15, 2014 inadvertently excluded certain records. It was ultimately confirmed that an inadvertent programming error was made in the database query that was used to extract the data requested by the United States and that the data set provided in January was incomplete.
4. The incomplete data extraction was caused by an error in programming logic. This error resulted from the misinterpretation by the programmer of the CARD STATUS information in the DLS database. The CARD STATUS field is one of the data elements specifically requested to be included in this data extract. The DLS database uses the CARD STATUS field to identify nineteen (19) different statuses for a driver license and seven (7) for an Identification Card. Please refer to the below list:

DL card status

01 PURGED;
03 REVOKED SEX OFFENDER;
04 VOLUNTARY SURRENDER;
05 VOLUNTARY SURRENDER CSO;
06 DENIED TEXAS LIMB WAIVER;
07 DENIED TEXAS VISION WAIVER;
08 EXPIRED LIMB WAIVER;
09 EXPIRED VISION WAIVER;
10 IGNITION INTERLOCK REQUIRED;
11 LIMB WAIVER NEEDED;
12 REQUIRED DOWNGRADE;
13 RESTRICTION REQUIRES REVIEW;
14 VERIFY ISSUE FORMER STATE;
15 VISION WAIVER NEEDED;
16 VOLUNTARY SURRENDER INSURANCE;
17 VOLUNTARY SURRENDER MEDICAL;
18 RETURNED BY POST OFFICE;
19 ITEMS SURRENDERED;
20 DOCUMENTS NEEDED;



ID card status

01 PURGED;
03 REVOKED SEX OFFENDER;
04 VOLUNTARY SURRENDER;
05 VOLUNTARY SURRENDER CSO;
06 RETURNED BY POST OFFICE;
07 ITEMS SURRENDERED;
08 DOCUMENTS NEEDED;

Another field in the database shows whether a previously assigned card status has been removed. In other words, simply looking at the CARD STATUS field does not accurately reflect which licenses *currently* have a status assigned to them. In order to get a complete picture, one must also consult the DATE REMOVED field to see if the status which was previously assigned to the license was then later removed. The inadvertent programming error resulted from DPS' effort to provide this complete picture.

Thus, if a record had an active card status assigned to it or never had a card status assigned to it, then the record was included in the January data set. However, the program inadvertently excluded license holders for whom a status had been previously assigned, but since removed. These missing records are why the data extract is incomplete. Only those who at one time had a status which was later removed were inadvertently excluded from the data set.

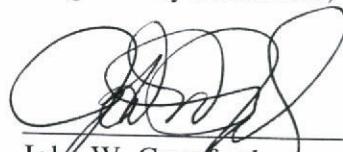
5. This misapplication of the data qualifier resulted in the inadvertent exclusion of approximately 2.8 million records.

6. The Department does not have the ability to re-run the January 15th data extract. However, the Department continues to investigate the possibility of extracting the missing data in the format used in January.

I swear under penalty of perjury that these responses are true and correct to the best of my knowledge.

Dated: July 22, 2014

Respectfully Submitted,



John W. Crawford
Applications Manager, Licensing Services
Information Technology Division
Texas Department of Public Safety